Before the

Federal Communications Commission Washington, DC 20554

In the Matter of	)	
	)	
Delete, Delete, Delete	)	GN Docket No. 25-133
	)	
Implementing Executive Order 14192	)	
Of January 31.2025	)	

NASNA COMMENTS ON

DEREGULATION

I. Introduction and Background

The National Association of State 911 Administrators Association (NASNA)[1] respectfully submits these comments in response to the Federal Communications Commission's (Commission) in the above-captioned Public Notice on addressing regulation that may hamper innovation and growth in the United States. NASNA has been engaged in many of the Commission's dockets and activities involving 911 at the technical, operational, and funding levels.[2] Our collective experience and record of 911 implementation has established NASNA as subject matter experts in the field of 911.

[1] The National Association of State 911 Administrators (NASNA) is comprised of members representing the states and U.S. territories on public policy issues impacting the successful implementation of 911 systems. While each state is unique in its 911 implementation based on its own needs and demographics, members face common issues and challenges. NASNA serves as a centralized information sharing and support network for state 911 program administrators. The 911 leadership represented by the NASNA's membership can assist industry associations, public policymakers, the private sector, and emergency communications professionals at all levels in address complex issues surrounding emergency communications.

[2] Examples include NASNA's membership on various CSRIC working groups TFOPA, and the 911 Fee Diversion Strike Force.

With that background, NASNA respectfully urges the Commission to approach its reductions in regulation with a cautious eye on the rules that preserve and facilitate a strong 911 public safety system. As leaders in the deployment of NG911 throughout the nation, matters involving regulation that touches 911 are crucial to us, NASNA respectfully asks that the Commission continue its course of oversight in the facilitation of NG911 and maintain its current role in legacy 911 telecommunications.

We believe that deregulation should be done in a manner that fosters innovation and prosperity, however, issues impacting 911 operations and networks should be examined thoughtfully in advance to avoid unforeseen consequences in the delivery of public safety. NASNA wishes to iterate several points that we believe are important for the Commission to consider.

II. Considerations:

There are existing rules and evolving dockets that should be preserved. While those listed below are not an exhaustive list, they are issues that are key to the health of 911 systems nationwide. These support 911 and its progress at both operational and technological levels and need to remain in place and continue to be pursued by the Commission.

A. **Progress to NG911**: The NG911 rules set out in 47 CFR § 9.27 - 9.34 and those recently proposed in the Commission's recent Further Notice of Proposed Rule Making (FNPRM) on NG911[3] are essential to both the technical and cost responsibilities to fully move the nation's 911 system from legacy analog 911 to IP-based NG911. The recognition of standards and system consistency, expanding definitions, as well as clarifying roles and responsibilities within NG911 as discussed in the FNPRM[4] are

[3] https://docs.fcc.gov/public/attachments/FCC-25-21A1.pdf
[4] *Id*. at paras. 23-55

needed, now and for the future of successful NG911 deployment.

B. **NG911 Interoperability:** NASNA is grateful to see the Commission giving this specific issue attention and consideration in its FNPRM.[5] As the nation moves into an advanced 911 system, interoperability will be key to systems to effectively interconnecting with each other. The role of the FCC's oversight will be crucial to ensure the vision of a seamless NG911 system is fulfilled.

C. **Accountability and Reliability:** The Commission has long-supported positions and rules to ensure the consistent delivery of 911. Important regulation regarding dependable 911 service include outage reporting[6], system reliability,[7] wireless location accuracy[8], and system security[9]. We urge the Commission to continue to examine and proactively address system outage causes and reporting as we have seen in ongoing dockets[10].

III. Conclusion:

The proactive pursuit of a robust and reliable 911 system through rules that foster reliability, resiliency, security, interoperability, and accountability for NG911 in advance of deployment is essential to 911 sustainability. These should be the driving factors in any

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[5] *Id*. at paras. 71-89
[6] 47 CFR § 4.1-4.11
[7] 47 CFR § 9.19
[8] 47 CFR § 9.10
[9] 47 CFR § 9.11
[10] *See, e.g.,* PS Docket Nos.15-80 13-75 and ET Docket No. 04-35

consideration of rules that touch matters of public safety.

NASNA appreciates the Commission's commitment to government efficiency and the innovation of technology by exploring the effectiveness of regulatory burdens and constraints. We urge the Commission to carefully explore the reduction or retraction of the regulatory protections that have been implemented to facilitate and safeguard the nation's front line of emergency communications - the 911 system.

Respectfully Submitted,

Harriet Rennie-Brown
Executive Director
National Association of State 911 Administrators
1105 Hill St.
Traverse City, MI 49684
517-243-2075
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